From: Chen, Isaac <u>Dwyer, Stacey</u>; <u>Brent Larsen</u> To: Subject: FW: Chukar Deepwater Subsea Waterjet - Abrasive Suspension Discharges Date: Tuesday, September 20, 2016 9:02:00 AM







From: Warren Christopherson [mailto:warrenc@chukarwaterjet.com]

Sent: Wednesday, July 27, 2016 1:22 PM

To: Chen, Isaac < chen.lsaac@epa.gov">chen.lsaac@epa.gov>; shell.carrie-joe@epa.gov

Cc: Wilson, Scott < <u>Wilson.Js@epa.gov</u>>; Bruce Kivisto < <u>Brucek@chukarwaterjet.com</u>> **Subject:** FW: Chukar Deepwater Subsea Waterjet - Abrasive Suspension Discharges

Isaac (Region 6) and Carrie-Joe (Region 4),

I discussed our request on the phone with Scott Wilson yesterday. He suggested I start by sending my request to both you for Region 6 and to Carrie-Joe for Region 4. I have attached two letters for your review. The first is our request to discharge abrasive and the second is our **CONFIDENTIAL** Abrasive Discharge Mixture. Also a copy of the Safety Data Sheets (SDS) for each of the items that will be mixed with water is attached.

Please let me know if you need any additional information. Thank you,

Warren Christopherson

Chukar Waterjet, Inc.

12070 43rd Street NF

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Toll Free 1-888-497-8749 ext. 730 Email: warrenc@chukarwaterjet.com Website: http://chukarwaterjet.com



From: Bruce Kivisto [mailto:BruceK@chukarwaterjet.com]

Sent: Monday, July 25, 2016 11:34 AM

To: Warren Christopherson

Subject: FW: Chukar Deepwater Subsea Waterjet - Abrasive Suspension Discharges

From: Wilson, Scott [mailto:Wilson.Js@epa.gov]
Sent: Monday, July 25, 2016 11:21 AM
To: Chen, Isaac; BruceK@chukarwaterjet.com

Subject: RE: Chukar Deepwater Subsea Waterjet - Abrasive Suspension Discharges

I agree with Isaac. Since this is a new discharge that hasn't previously been addressed by the permit, you will need to provide specific information so that it can be authorized by the reissued permit. Is shouldn't be a big issue to authorize the discharge since it appears to be pressurized water and an inert abrasive, but the Fact Sheet for the permit renewal will need to explain why the discharge is consistent with Ocean Discharge Criteria.

Scott Wilson
Energy Permitting Coordinator
Industrial Permits Branch
USEPA Office of Wastewater Management
1200 Pennsylvania Ave., NW
Washington, DC 20460
202-564-6087

Mail Code: 4203m

From: Chen, Isaac

Sent: Monday, July 25, 2016 12:09 PM

To: BruceK@chukarwaterjet.com; Wilson, Scott Wilson, Scott

Subject: RE: Chukar Deepwater Subsea Waterjet - Abrasive Suspension Discharges

Mr. Kivisto,

The current permit will expire in a year and I am working on permit renewal. We will not consider any new discharges during the term of the current permit. If you want us to consider a new discharge, please provide me details about the products and all toxicity testing results ASAP so EPA may review your request. Thanks.

Isaac Chen NPDES Permits & TMDL Branch Permitting Section 214-665-7364

From: Bruce Kivisto [mailto:BruceK@chukarwaterjet.com]

Sent: Monday, July 25, 2016 10:52 AM

To: Chen, Isaac < Chen.Isaac@epa.gov>; Wilson, Scott < Wilson, Scott < Chen.Js@epa.gov>>

Subject: RE: Chukar Deepwater Subsea Waterjet - Abrasive Suspension Discharges

Dear Isaac and Scott.

Hello. My name is Bruce Kivisto. I am writing to you from Chukar Waterjet, Inc. The reason for my email is to open the process of obtaining EPA and/or other necessary approvals to use an abrasive suspension in our deepwater subsea waterjet cutting system in the Gulf of Mexico.

I visited with some of the group over at BOEM New Orleans office a little over a week ago. One of the topics of discussion was the content and approval process that is required to begin using this said abrasive suspension in the Gulf of Mexico. They suggested I start with contact to you.

This is our company's first product designed for marine use and so with this email I would ask for your guidance in helping us start the necessary testing and/or evaluation process required by your agency for approval of this product.

Sincerely and best regards,

Bruce Kivisto General Manager Chukar Waterjet, Inc. m: +1 763 370 5415

e: brucek@chukarwaterjet.com www.chukarwaterjet.com